

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
MEDIA AND WIRELESS)	
TELECOMMUNICATIONS BUREAUS)	
SEEK COMMENT ON RECOMMENDATION)	GN Docket No. 10-244
OF THE ADVISORY COMMITTEE ON)	
DIVERSITY FOR COMMUNICATIONS IN THE)	
DIGITAL AGE FOR A NEW AUCTION)	
PREFERENCE FOR OVERCOMING)	
DISADVANTAGE)	

COMMENTS OF YOURTEL AMERICA, INC.

Introduction

YourTel America, Inc. (“YourTel” or “Company”), respectfully submits these Comments in response to the December 2, 2010 request of the Media and Wireless Telecommunications Bureau.¹ This request was initiated for the collection of information to aid the Commission in deciding how to respond to the Advisory Committee on Diversity for Communications in the Digital Age’s rulemaking recommendation “...to consider how the Commission could design, adopt, and implement and additional new preference program in its competitive bidding process.”²

YourTel is a small, minority owned telecommunications carrier headquartered in Kansas

¹ See *Media and Wireless Telecommunications Bureaus Seek Comment on Recommendation of the Advisory Committee on Diversity for Communications in the Digital Age for a New Auction Preference for Overcoming Disadvantage*, GN Docket No. 10-244, DA 10-2259, Dec. 2, 2010.

² See *Recommendation on Preference for Overcoming Disadvantage*, FCC Advisory Committee on Diversity for Communications in the Digital Age, October 14, 2010.

City, Missouri that provides local and long distance services to low-income customers in Kansas, Missouri, Oklahoma and Illinois. YourTel has been designated as an ETC by the public utility commissions in Kansas, Missouri, Oklahoma and Illinois, has been an active participant in the USF low-income Lifeline and Link Up program since 2003 and a consistent vocal supporter of telecommunications access for the underserved. The vast majority of YourTel's customers are Lifeline eligible, consistently struggle to gain affordable access to basic telecommunications services, 95% of them did not have telephone service prior to purchasing YourTel's services and virtually none of YourTel America's lifeline customers have access to affordable Broadband. This country's minority and diverse communities compose a significant percentage of YourTel's customer base and employees. Therefore, YourTel is well positioned to provide experienced comment and insight on this matter and welcomes any effort that will assist individuals or companies in being able to participate in the competitive bidding for FCC licenses.

COMMENTS

I. Overcoming "disadvantage"

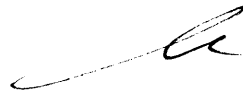
YourTel, as a provider of service to low-income consumers, understands first-hand the challenges of providing alternative telecommunications services to diverse communities and is in the unique position to witness daily the hardship and negative effects manifested by the lack of affordable access.

While there is much valuable discussion in the Advisory Committee's recommendations regarding what qualifies an individual or business as disadvantaged, in this economic era any small business that serves the underserved such as YourTel is disadvantaged. We are caught between rising wholesale costs, and no viable options for affordable broadband for our

customers. The Commission must either force the current duopoly carriers to share their broadband networks at reasonable cost with carriers better suited to served the underserved or create an opportunity for companies such as YourTel to construct a next generation wireless broadband network.

YourTel therefore strongly urges the Commission in this proceeding to look to ways of providing opportunities that best serve disadvantaged consumers and the disadvantaged companies that can best serve them.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Schmick', with a long horizontal flourish extending to the left.

Dale Schmick
Vice-President
YourTel America, Inc
2800 E 18th Street
Kansas City, MO 64127
816-388-1000
dschmick@yourtel.com

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